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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 20-108-4 JD
)	
Plaintiff,)	
)	STIPULATION REGARDING RESTITUTION
v.)	AND PROPOSED ORDER
)	
CHRISTOPHER TODD POOL,)	Court: Hon. James Donato
)	
Defendant.)	
)	

Defendant, Christopher Todd Pool, and the United States agree and stipulate as follows:

Pursuant to 18 U.S.C. § 3663A and defendant's plea agreement, defendant agrees to pay restitution in the total amount of \$319,914.44.

The total restitution amount includes \$6412.50 to Identity Theft Victims B.M. and L.M. for attorney's fees associated with the fraudulent loans taken out in their names. Codefendants Mark Hicks, Demarcus Hicks, Dionysius Costello, and Susan Arreola-Martin are jointly and severally liable on the restitution owed to this victim.

The total restitution amount also includes \$6,600.00 to MAE Capital Mortgage Inc for reimbursement of the commission to the investor and the credit report involving the fraudulent loan taken out in the names of Identity Theft Victims B.M. and L.M. Codefendants Mark Hicks, Demarcus

STIPULATION RE: RESTITUTION AND ~~PROPOSED~~ ORDER
CR 20-108 JD

Hicks, Dionysius Costello, and Susan Arreola-Martin are jointly and severally liable on the restitution owed to this victim.

The total restitution also amount also includes \$306,901.94 to Placer Title Company for reimbursement on an insurance claims for losses associated with the fraudulent loan taken out in the names of Identity Theft Victims B.M. and L.M. Codefendants Mark Hicks, Demarcus Hicks, Dionysius Costello, and Susan Arreola-Martin are jointly and severally liable on the restitution owed to this victim.

Under 18 U.S.C. § 3664(j)(1), if a third party provides compensation to a victim of an offense, “the restitution order shall provide that all restitution of victims required by the order be paid to the victims before any restitution is paid to such a provider of compensation.” For this reason, the parties request that the Court order that no restitution payment shall go to the insurer until the other victims have been full repaid.

The specific amounts per each victim are listed on the attached table, and the parties request that the Court order restitution in the amounts reflected on that table.

IT IS SO AGREED AND STIPULATED.

DATED: August 25, 2022

/s/ Barbara J. Valliere
BARBARA J. VALLIERE
Assistant United States Attorney

/s/ Charles Woodson (with permission)
CHARLES WOODSON
Attorney for Defendant Christopher Todd Pool

~~PROPOSED~~ RESTITUTION ORDER

Pursuant 18 U.S.C. § 3663A, defendant is ordered to pay \$319,914.44 in restitution as part of the final judgment in this case. The Court finds that this is the amount of money that the victims lost as a result of defendant's scheme to defraud for which she has been convicted, and the Court finds that these losses were proximately caused by the scheme to defraud.

The Court orders that restitution be awarded to each victim in the amounts reflected on the attached table. As required by 18 U.S.C. § 3664(j)(1), no restitution payment shall be made to the insurer (Placer Title Company) until defendant has paid the entirety of the restitution owed to the other victims.

IT IS SO ORDERED.

DATED: August 29, 2022



HON. JAMES DONATO
UNITED STATES DISTRICT JUDGE

United States v. Christopher Pool, 20-CR-108-4 JD
Restitution Chart

Name of payee	Restitution	Defendants Responsible
B.M and L.M.	\$6412.50	Mark Hicks, Demarcus Hicks, Dionysius Costello Susan Arreola-Martin Christopher Pool
MAE Capital Mortgage Inc. 4940 Pacific Street Suite A Rocklin CA 95677	\$6600.00	Mark Hicks, Demarcus Hicks, Dionysius Costello Susan Arreola-Martin Christopher Pool
Placer Title Company 7643 North Ingram Avenue Fresno, California 93711	\$306,901.94	Mark Hicks, Demarcus Hicks, Dionysius Costello Susan Arreola-Martin Christopher Pool
Total	\$319,914.44	